

**CIVIL ACTION NUMBER:
1:19-cv-01624-ACA**

Plaintiff Dejah Atkins (“Plaintiff”) and Jacksonville State University (“Defendant”) (collectively, the “Parties”) respectfully propose, consent, and move the Court for entry of a Qualified HIPAA Protective Order, a copy of which is attached hereto as Exhibit A. The Parties agree that the entry of the Qualified HIPAA Protective Order attached hereto will facilitate discovery in this matter, such as production of Plaintiff’s medical records, providing an Order governing the dissemination of protected health information of plaintiff to satisfy potential questions by health care providers.

THIS WILL CERTIFY THAT ALL PARTIES HAVE AGREED TO THE ABOVE.
FURTHER, THE PARTIES HAVE AGREED THAT JOSH C. HARRISON WILL
E-FILE THE FOREGOING.

Respectfully submitted this 9th day of September, 2019.

s/ Bhavani Raveendran

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